

EXHIBIT 4

HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

WAYMO LLC

Case No. 3:17-cv-00939-JCS

Plaintiff.

VS

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO TRUCKING
LLC

Defendants

**PLAINTIFF WAYMO LLC'S THIRD SET
OF REQUESTS FOR PRODUCTION TO
DEFENDANTS**

Honorable William H. Alsup

**HIGHLY CONFIDENTIAL –
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PLAINTIFF'S THIRD SET OF REQUESTS FOR PRODUCTION
TO DEFENDANTS UBER TECHNOLOGIES, INC.; OTTOMOTTO, LLC; OTTO
TRUCKING LLC

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Waymo LLC (“Waymo”) request that Defendants Uber Technologies, Inc. (“Uber”), Ottomotto, LLC (“Ottomotto”), and Otto Trucking LLC (“Otto Trucking” (collectively “Defendants”), produce for inspection and copying within thirty days (30) hereof the documents set forth below at the offices

01980-00104/9336283 1

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1 **REQUEST FOR PRODUCTION NO. 157:**

2 DOCUMENTS sufficient to show the reasons behind DEFENDANTS’ and/or OTTO
3 TRUCKING’s decision not to deploy self-driving trucks in Texas.

4 **REQUEST FOR PRODUCTION NO. 158:**

5 DOCUMENTS sufficient to show DEFENDANTS’ past, present, and future plans to test
6 self-driving trucks in any state, INCLUDING (without limitation) Ohio, Nevada, Texas, Colorado,
7 Pennsylvania, Arizona, and California.

8 **REQUEST FOR PRODUCTION NO. 159:**

9 DOCUMENTS sufficient to show the total number of miles DEFENDANTS’ self-driving
10 trucks have traveled each month in each state, broken out by month and by state.

11 **REQUEST FOR PRODUCTION NO. 160:**

12 DOCUMENTS sufficient to show DEFENDANTS’ past, present, and future plans to test
13 self-driving trucks in any state, INCLUDING (without limitation) Ohio, Nevada, Texas, Colorado,
14 Pennsylvania, Arizona, and California.

15 **REQUEST FOR PRODUCTION NO. 161:**

16 All DOCUMENTS and COMMUNICATIONS REGARDING the naming of FUJI.

17 **REQUEST FOR PRODUCTION NO. 162:**

18 All DOCUMENTS and COMMUNICATIONS REGARDING the naming of SPIDER.

19 **REQUEST FOR PRODUCTION NO. 163:**

20 All DOCUMENTS and COMMUNICATIONS REGARDING the naming of OWL.

21 **REQUEST FOR PRODUCTION NO. 164:**

22 All COMMUNICATIONS between Brian McClendon and any PERSON REGARDING
23 LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSKI.

24 **REQUEST FOR PRODUCTION NO. 165:**

25 All COMMUNICATIONS between Travis Kalanick and any PERSON REGARDING
26 LiDAR, OTTOMOTTO, OTTO TRUCKING, or LEVANDOWSKI.